

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

Civil Action No. 1:14-cv-14176-ADB

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

**DECLARATION OF MICHAEL CONNOLLY IN SUPPORT OF SFFA'S  
OPPOSITION TO HARVARD'S MOTION FOR SUMMARY JUDGMENT**

I, Michael Connolly, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am over eighteen years of age, have personal knowledge of the facts stated herein, and if called upon to do so, could and would testify competently thereto.
2. I am an attorney at Consovoy McCarthy Park PLLC and represent Plaintiff Students for Fair Admissions, Inc. ("SFFA") in the above-styled action.
3. I provide this declaration in support of SFFA's opposition to Harvard's motion for summary judgment.
4. Attached hereto as Exhibit 262 is a true and correct copy of excerpts of SFFA's Objections and Responses to Plaintiff's Second Set of Interrogatories.
5. Attached hereto as Exhibit 263 is a true and correct copy of a document bearing bates number SFFA-Harvard 0000008-51 that was produced by SFFA in this litigation.
6. Attached hereto as Exhibit 264 is a true and correct copy of a document bearing bates number SFFA-Harvard 0000059-65 that was produced by SFFA in this litigation.

7. Attached hereto as Exhibit 265 is a true and correct copy of a document bearing bates number SFFA-Harvard 0000001 that was produced by SFFA in this litigation.

8. Attached hereto as Exhibit 266 is a true and correct copy of a document bearing bates number SFFA-Harvard 0000052-67 that was produced by SFFA in this litigation.

9. Attached hereto as Exhibit 267 is a true and correct copy of excerpts of the June 6, 2017 deposition of Sally Donahue.

10. Attached hereto as Exhibit 268 is a true and correct copy of a document entitled “2,058 Accepted Into Class of 2011,” which was obtained on July 27, 2018 from the website <https://www.thecrimson.com/article/2007/3/29/2058-accepted-into-class-of-2011/>.

11. Attached hereto as Exhibit 269 is a true and correct copy of a document entitled “College admits Class of ’18,” which was obtained on July 27, 2018 from the website <https://news.harvard.edu/gazette/story/2014/03/college-admits-class-of-18/>.

12. Attached hereto as Exhibit 270 is a true and correct copy of a document entitled “Harvard College admits 1,990,” which was obtained on July 27, 2018 from the website <https://news.harvard.edu/gazette/story/2015/04/harvard-college-admits-1990/>.

13. Attached hereto as Exhibit 271 is a true and correct copy of a document entitled “College admits 2,037,” which was obtained on July 27, 2018 from the website <https://news.harvard.edu/gazette/story/2016/04/college-admits-2037/>.

14. Attached hereto as Exhibit 272 is a true and correct copy of a document entitled “Harvard College admits 2,056 to Class of ’21,” which was obtained on July 27, 2018 from the website <https://news.harvard.edu/gazette/story/2017/03/2056-applicants-were-invited-today-to-join-harvard-colleges-class-of-2021>.

15. Attached hereto as Exhibit 273 is a true and correct copy of excerpts of the August 3, 2017 deposition of William Fitzsimmons.

16. Attached hereto as Exhibit 274 is a true and correct copy of document excerpts bearing bates numbers HARV00007805 through HARV00007810 that were produced by Harvard in this litigation.

17. Attached hereto as Exhibit 275 is a true and correct copy of excerpts of the June 16, 2017 deposition of [REDACTED]

18. Attached hereto as Exhibit 276 is a true and correct copy of excerpts of the July 12, 2017 deposition of [REDACTED]

19. Attached hereto as Exhibit 277 is a true and correct copy of the declaration of [REDACTED], which was executed on June 27, 2018.

20. Attached hereto as Exhibit 278 is a true and correct copy of the declaration of [REDACTED], which was executed on June 26, 2018.

21. Attached hereto as Exhibit 279 is a true and correct copy of the declaration of [REDACTED], which was executed on April 4, 2018.

22. Attached hereto as Exhibit 280 is a true and correct copy of the declaration of [REDACTED], which was executed on June 19, 2018.

23. Attached hereto as Exhibit 281 is a true and correct copy of the declaration of [REDACTED], which was executed on July 3, 2018.

24. Attached hereto as Exhibit 282 is a true and correct copy of the declaration of [REDACTED], which was executed on June 26, 2018.

25. Attached hereto as Exhibit 283 is a true and correct copy of the declaration of [REDACTED], which was executed on June 21, 2018.

26. Attached hereto as Exhibit 284 is a true and correct copy of the declaration of Peter Arcidiacono, which was executed on July 30, 2018.

27. Attached hereto as Exhibit 285 is a true and correct copy of excerpts of the July 12, 2016 deposition of Edward Blum.

\* \* \*

I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct to the best of my knowledge.

Executed on this day, July 30, 2018.

/s/ Michael Connolly  
Michael Connolly